

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2021-__-G

In the Matter of)

Application of Piedmont Natural Gas)
Company, Inc. for Expedited Approval of)
Waiver of Late Payment Penalties)

**REQUEST FOR EXPEDITED APPROVAL
OF WAIVER**

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), through counsel, and pursuant to S.C. Code Ann. Regs. 103-401 (2020), hereby requests leave of the Public Service Commission of South Carolina (“Commission”) to waive the application of late payment penalties provided for in its various Commission-approved rate schedules on certain amounts. Whereas S.C. Code Ann. Regs. 103-439(3) states that “[a] charge of no more than one and one-half percent (1½ %) may be added to any unpaid balance not paid within twenty-five days of the billing date to cover the cost of collection and carrying accounts in arrears,” Piedmont’s Commission-approved tariffs prescribe that a 1½ % late payment charge be applied to all balances not paid prior to the next month’s billing date.¹ Winter storm-related operational impacts last week at the bill printing facility and regional postal service used by the Company for rendering bills has caused certain February 2021 bills to be mailed to its South Carolina customers with delay. Piedmont respectfully requests that the Commission issue an order on an expedited basis that authorizes Piedmont to waive any late payment charges that would otherwise be incurred by the affected South Carolina customers from late payment of their delayed February 2021 cycle bills.

In support hereof, Piedmont respectfully shows unto the Commission the following:

¹ __See the late payment charge terms described in Piedmont’s Commission-approved tariff under Rate Schedules 201, 202, 252, 203, 204, 205, 206, 208, 213 and 214.

1. It is respectfully requested that any notices or other communications with respect to this Petition be sent to:

T. Richmond McPherson III
McGuireWoods LLP
201 North Tryon Street, Ste. 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2038
Email: rmcpherson@mcguirewoods.com

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

3. KUBRA is the third-party vendor that prints and mails Piedmont's customer bills. KUBRA prints and mails Piedmont's customer bills from a facility located in Dallas, Texas.

4. Many parts of Texas, including Dallas, experienced extreme winter weather last week that resulted in substantial amounts of snow accumulation and freezing temperatures throughout the state. This unprecedented winter weather event has severely disrupted normal business operations, including regional postal service, within and from that area of the country.

5. Due to this disruption of normal business operations in Texas, KUBRA experienced a brief (one-day) work stoppage in the printing of Piedmont's bills last week. More impactful to Piedmont's billing process was that mail service to and from Texas was significantly disrupted. The Piedmont customer bills that were to be mailed by KUBRA last week, which were ultimately mailed with a few days' delay due to the weather-related operational impacts in Texas, are those customer bills scheduled under February 2021 billing cycles 8, 9, 10, 11 and 12. Approximately 43,800 Piedmont customer accounts are billed under

February 2021 billing cycles 8 through 12. Of the customer bills under those five cycles, approximately 13,100 (30%) are ebills to customers who have elected to suppress the mail delivery of their bill in favor of electronic bill delivery instead. No customer ebills were sent with delay last week. The remaining 70% of customer bills in those five cycles were for customers who did not elect ebills in lieu of traditional mail delivery of their bill; as such, these customers are facing in delay in the delivery of their February 2021 bills by physical mail service. As currently expected, this weather event will likely not impact the timely mailing of bills to customers under February 2021 bill cycles beyond cycle 12.

6. In order to avoid a financial impact on Piedmont's customers caused by the delay in receiving their bill, Piedmont desires to forgo assessing late payment charges associated with customer bills mailed with delay during this extreme weather event, which is currently expected to be limited to those bills rendered under February 2021 billing cycles 8 through 12.

7. Accordingly, Piedmont requests expedited Commission authorization to implement a waiver of the 1½ % late payment penalty provided for in Piedmont's various Commission-approved rate schedules for Piedmont's South Carolina customers for these identified delayed bills, and any others that may be affected by this weather event.

8. Piedmont is also forgoing for 30 days the disconnection of service for non-payment of bills to customers impacted by this February 2021 billing cycle delay.²

9. Piedmont respectfully submits that the relief requested herein is consistent with the public interest and is based upon good cause shown.

² Pursuant to S.C. Code Ann. Regs. 103-442(g), the Company *may* discontinue service for nonpayment of bills rendered provided that the Company has made reasonable efforts to effect collection and has complied with the provisions of regulation 103-452.

CONCLUSION

WHEREFORE, Piedmont respectfully requests leave of the Commission to waive its late payment penalties for the delayed mail service delivery of February 2021 cycle bills to impacted customers.

Respectfully submitted this 23rd day of February, 2021.

Piedmont Natural Gas Company, Inc.

/s/ T. Richmond McPherson III

T. Richmond McPherson III

McGuireWoods LLP

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Charlotte, North Carolina 28202

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